

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No.: 22-CV-22538-ALTMAN/REID

Pierce Robertson, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

CLASS ACTION COMPLAINT

v.

JURY DEMAND

Mark Cuban, and Dallas Basketball Limited,
d/b/a Dallas Mavericks

Defendants.

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**PLAINTIFFS' CERTIFICATE OF INTERESTED PARTIES
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to this Court's instructions at the October 28, 2022 Status Conference, Plaintiffs Pierce Robertson, Rachel Gold, Sanford Gold, Rahil Sayed, Christopher Ehrentraut, Todd Manganiello, Dan Newsom, William Ayer, Anthony Dorn, Dameco Gates, Marshall, and Edwin Garrison ("Plaintiffs"), hereby disclose the following list of known persons, associated persons, firms, partnerships or corporations that have a financial interest in the outcome of this case, including all subsidiaries, conglomerates, affiliates, parent corporations, and other identifiable legal entities related to a party in this case:

1. Pierce Robertson, Plaintiff
2. Rachel Gold, Plaintiff
3. Sanford Gold, Plaintiff
4. Rahil Sayed, Plaintiff
5. Christopher Ehrentraut, Plaintiff
6. Todd Manganiello, Plaintiff
7. Dan Newsom, Plaintiff
8. William Ayer, Plaintiff
9. Anthony Dorn, Plaintiff
10. Dameco Gates, Plaintiff
11. Marshall Peters, Plaintiff
12. Edwin Garrison, Plaintiff

13. Putative Class Members:

- a. **Nationwide Class**: All persons or entities in the United States who, within the applicable limitations period, purchased or enrolled in an EPA.
- b. **Florida Subclass**: All persons or entities in the state of Florida who, within the applicable limitations period, purchased or enrolled in an EPA.
- c. **New Jersey Subclass**: All persons in the state of New Jersey who, within the applicable limitations period, purchased or enrolled in an EPA.
- d. **Virginia Subclass**: All persons in the state of Virginia who, within the applicable limitations period, purchased or enrolled in an EPA.
- e. **Alabama Subclass**: All persons in the state of Alabama who, within the applicable limitations period, purchased or enrolled in an EPA.
- f. **Louisiana Subclass**: All persons in the state of Louisiana who, within the applicable limitations period, purchased or enrolled in an EPA.
- g. **California Subclass**: All persons in the state of California who, within the applicable limitations period, purchased or enrolled in an EPA.
- h. **Oklahoma Subclass**: All persons in the state of Oklahoma who, within the applicable limitations period, purchased or enrolled in an EPA.
- i. **Pennsylvania Subclass**: All persons in the state of Pennsylvania who, within the applicable limitations period, purchased or enrolled in an EPA.
- j. **Tennessee Subclass**: All persons in the state of Tennessee who, within the applicable limitations period, purchased or enrolled in an EPA.

Excluded from the Classes are Defendants and their officers, directors, affiliates, legal representatives, and employees, any governmental entities, any judge, justice, or judicial officer presiding over this matter and the members of their immediate families and judicial staff.

14. The Moskowitz Law Firm, PLLC, Counsel for Plaintiffs

- a. Adam M. Moskowitz
- b. Joseph M. Kaye
- c. Barbara C. Lewis

15. Boies Schiller Flexner, LLP Counsel for Plaintiffs

- a. David Boies

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- b. Stephen Neal Zack
- c. Hon. Ursula Ungaro (Ret.)
- 16. Mark Cuban, Defendant
- 17. Dallas Basketball Limited, d/b/a Dallas Mavericks, Defendant
- 18. Fowler White Burnett, P.A., Counsel for Defendants
 - a. Christopher E. Knight
 - b. Esther E. Galicia
 - c. Alexandra L. Tifford
- 19. Brown Rudnick LLP, Counsel for Defendants
 - a. Stephen A. Best
 - b. Rachel O. Wolkinson
 - c. Sigmund Wissner-Gross

I hereby certify that, except as disclosed above, I am unaware of any actual or potential conflict of interest involving the district judge and magistrate judge assigned to this case and will immediately notify the Court in writing on learning of any such conflict.

Dated: November 18, 2022.

Respectfully submitted,

By: /s/ Adam M. Moskowitz

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was filed on November 18, 2022, with the Court via CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam M. Moskowitz
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